

FILED
Clerk
District Court

JUN - 8 2006

For The Northern Mariana Islands
By _____
(Deputy Clerk)

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5 Attorney for: Defendants CNMI, Forelli, Bush, Cotton and Brown

6 IN THE UNITED STATES DISTRICT COURT
7 DISTRICT OF THE NORTHERN MARIANA ISLANDS

8 ROBERT D. BRADSHAW,

Case No. 05-0027

9 Plaintiff,

10 vs.

UNOPPOSED MOTION TO EXCEED PAGE
LIMIT LOCAL RULE 7.1(d)

11 COMMONWEALTH OF THE NORTHERN
MARIANA ISLANDS, NICOLE C. FORELLI,
12 WILLIAM C. BUSH, D. DOUGLAS COTTON,
L. DAVID SOSEBEE, ANDREW CLAYTON,
13 UNKNOWN AND UNNAMED PERSONS IN
THE CNMI OFFICE OF THE ATTORNEY
14 GENERAL, ALEXANDRO C. CASTRO, JOHN
A. MANGLONA, TIMOTHY H. BELLAS,
15 PAMELA BROWN, ROBERT BISOM, AND
JAY H. SORENSEN,

16 Defendants.
17

18 MOTION

19 Defendants Commonwealth of the Northern Mariana Islands, Nicole Forelli, William C. Bush,
20 D. Douglas Cotton, and Pamela Brown (hereafter collectively "Defendants") request that this Court
21 allow Defendants to exceed the twenty-five (25) page limit prescribed by L.R. 7.1(d).

1 Defendants intend to file a motion to dismiss Plaintiff Bradshaw's Amended Complaint under
2 Fed. R. Civ. P. 12 (b) (6). Plaintiff's Second Amended Complaint is seventy-five (75) pages long and
3 contains numerous causes of action under an exhaustive list of federal civil and criminal statutes,
4 including, among others, the Racketeer Influence Corrupt Organizations Act, the Immigration Reform
5 and Control Act and several Federal Civil Rights causes of action. In the interest of judicial economy,
6 Defendants intend to file one consolidated motion to dismiss.

7 Crafting a motion to dismiss, which addresses Plaintiff Bradshaw's numerous allegations is
8 quite an undertaking requiring Defendants to discuss numerous legal theories, causes of action and
9 factual matters. Defendants believe their motion will be fifty (50) pages or less and intend to file it on
10 or before June 17, 2006.

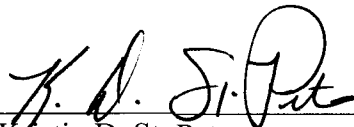
11 Plaintiff Bradshaw was contacted telephonically by Assistant Attorney General Kristin St.
12 Peter on June 8, 2006 at 10:15 a.m. (Saipan Local) and has no objection to this Motion.

13 WHEREFORE, based upon the foregoing, Defendants respectfully request that this Court grant
14 Defendants' Motion to Exceed Page Limit.

15 Respectfully submitted,

16 CNMI ATTORNEY GENERAL'S OFFICE
17 ON BEHALF OF DEFENDANTS CNMI, FORELLI,
18 BUSH, COTTON AND BROWN

19
20 By


Kristin D. St. Peter

CERTIFICATE OF SERVICE

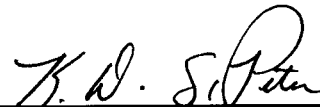
I HEREBY CERTIFY that a copy of the foregoing was served, via U.S. Mail or Personal Service, on the 8 day of June 2006, upon the following:

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